

ATTACHMENT

Status of State response to EPA's July 17, 2014 Letter:

1. Drinking Water Source Evaluation

State to provide initial assessment of whether any existing and potential sources of drinking water are at risk of contamination from improper Class II injection (due Sept 15th).

- Location of private and public water system wells that may be at risk due to permitted Class II injection **COMPLETED.**
- A plan to ensure protection of human health from actual or potential exposure to DW affected by any injection wells **IN PROGRESS, CURRENT STATUS NOT KNOWN.**
- A plan to communicate information to the public and to address subsequent questions/concerns **OVERDUE.**
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2. Documentation of Aquifer Exemptions

Provide all documents that pertain to the State's requests for aquifer exemptions, EPA's approval or denial of such requests, and any post-primacy appeals by the State regarding aquifer exemptions (due August 18th). **SOME DOCUMENTS RECEIVED VIA E-MAIL ON AUGUST 18, 2014; ONE CD OF 175 DOCUMENTS RECEIVED ON SEPT 5, 2014 AND ONE CD OF 40 DOCUMENTS RECEIVED ON NOV 4, 2014. CURRENT STATUS UNKNOWN.**

3. Tiered Review of Class II Wells

- a. Provide the number and location of all Class II wells permitted to inject in non-hydrocarbon producing formations with water quality less than 10,000 ppm TDS (excluding the formations known to be exempt). For each well, submit: operator's name, well type, depth, field and formation names, date injection commenced, water quality of both injection formation and injection fluid, and other pertinent details. (Due August 18th). **PARTIAL DATA SET RECEIVED; INACCURATE AND INCOMPLETE**
- b. Provide the number and location of all Class II wells permitted to inject in non-exempt hydrocarbon-producing formations with water quality below 10,000 ppm TDS. For each well, submit: operator's name, well type, depth, field and formation names, date injection commenced, water quality of both injection formation and injection fluid, and other pertinent details. (Due October 15th). **PARTIAL DATA SET RECEIVED; INACCURATE AND INCOMPLETE**
- c. Submit a plan and timeline for completion of a searchable database of all Class II injection well information statewide (along with a GIS overlay of the injection wells, injection formations, and aquifer exemptions). (Due September 15th). **OVERDUE**
- c. Develop a plan and timeline for submission to EPA of any new or revised aquifer exemption requests, which the State determines are appropriate. (Due September 15th). **OVERDUE**

4. State Program Consistency

Provide a status report on DOGGR's progress on the November 2012 Action Plan, which addressed Class II program deficiencies identified by EPA in our 2011 program audit. EPA also asked for a schedule for any proposed revisions to the Plan and for completing implementation of the Action Plan. (Due August 18th). **OVERDUE**